

STATE OF SOUTH CAROLINA

(Caption of Case)

Petition of Duke Energy Carolinas, LLC and Duke
Energy Progress, LLC for Approval of CPRE Queue
Number Proposal, Limited Waiver of Generator
Interconnection Procedures, and Request for
Expedited Review

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2018 - 202 - E

(Please type or print)

Submitted by: Charles L.A. TerreniSC Bar Number: 15235Address: 1508 Lady StreetTelephone: 803-771-7228Columbia, SC 29201Fax: 803-771-8778

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DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Routine

INDUSTRY (Check one)

- ☒ Electric
☐ Electric/Gas
☐ Electric/Telecommunications
☐ Electric/Water
☐ Electric/Water/Telecom.
☐ Electric/Water/Sewer
☐ Gas
☐ Railroad
☐ Sewer
☐ Telecommunications
☐ Transportation
☐ Water
☐ Water/Sewer
☐ Administrative Matter
☐ Other: _____

NATURE OF ACTION (Check all that apply)

- | | | |
|--|--|--|
| <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Application | <input checked="" type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Complaint | <input type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Discovery | <input type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

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STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-202-E

In Re:

**Petition of Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC for
Approval of CPRE Queue Number
Proposal, Limited Waiver of Generator
Interconnection Procedures, and Request
for Expedited Review**

PETITION TO INTERVENE

INTRODUCTION

This Docket was opened on June 19, 2018, upon the filing of the Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively “Duke”) for Approval of CRPE Queue Number Proposal, Limited Waiver of Generator Interconnection Procedures, and Request for Expedited Review.

The Interstate Renewable Energy Council, Inc. ("IREC") now petitions to intervene in this matter pursuant to Commission Rule 103-825 and be made a party of record in the above-referenced Docket, with full rights of participation.

PETITIONER

1. IREC is a non-partisan, non-profit organization working nationally for 36 years to increase consumer access to sustainable energy and energy efficiency through independent fact-based policy leadership, quality workforce development, and consumer empowerment. In service of its mission, IREC works to increase the adoption of policies and regulatory reforms that expand access to and streamline grid integration of distributed

energy resources to optimize their widespread benefits. The scope of IREC's work includes updating interconnection processes to facilitate deployment of these resources. IREC operates a virtual office, with employees and contractors working on behalf of the organization located across the country, including in Utah, Texas, Florida, Colorado, Maryland, New York, and California. IREC's mailing address is P.O. Box 1156, Latham, New York 12110.

2. As a consumer-focused organization, IREC works independently from renewable energy industries, trade associations, technologies, and advocacy organizations to promote the creation of robust, competitive clean energy markets.

3. IREC's bylaws specifically authorize it to "represent the interests of residential and small-commercial customers before governmental agencies and other bodies to advance fair practices that ensure the safe and efficient integration and adoption of renewable energy, energy storage, and energy efficiency resources for the benefit of these customers." IREC Bylaws art. II, § C (included here as Attachment A).

4. In pursuit of its mission, IREC was granted permission to intervene¹ in and was heavily involved in the recent update of South Carolina's interconnection procedures (Docket No. 2015-362-E), portions of which Duke now seeks to waive. The 2015 update of the interconnection procedures, in which IREC participated as an intervenor, was "the product of a number of working sessions and meetings convened by [the Office of Regulatory Staff ("ORS")] during which the Utilities and interested stakeholders reviewed

¹ Pub. Serv. Comm. of S.C., Dkt. 2015-362-E, Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard, Directive Order No. 2015-832 (Dec. 2, 2015).

(footnote continued on next page)

and discussed the Utilities' proposed South Carolina interconnection procedures."² IREC participated in all four working group sessions, and the procedures adopted by the Commission incorporated "significant input and contributions from the stakeholder group," including proposals made by and advocated for by IREC.³

PETITION TO INTERVENE

5. Given IREC's involvement and stake in the update of the interconnection procedures that it expended significant resources helping to develop, IREC has a direct and substantial interest in Duke's request to waive those procedures.

6. Specifically, IREC will be directly impacted by Duke's proposed waiver of the interconnection procedures it worked to develop. Further, no other party will represent the customer-focused interests represented by IREC. The Commission has recognized the need for a diverse range of stakeholder input when considering South Carolina's interconnection procedures by the granting of intervention to a wide range of stakeholders⁴, and the same considerations apply here, where Duke seeks to waive them. This proceeding would benefit from IREC's representation of ratepayer interests in access to cost-effective and efficient clean energy and IREC's national expertise in interconnection best practices. Specifically, Duke seeks to waive portions of the interconnection procedures, which may have the effect of increasing interconnection timelines and costs for distributed generation

² Pub. Serv. Comm. of S.C., Dkt. 2018-202-E, Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard, Order No. 2016-191, p. 3 (Apr. 26, 2016).

³ *Id.*

⁴ *See generally* Pub. Serv. Comm. of S.C., Dkt. 2018-202-E, Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard.

projects in South Carolina. Such increases in timelines and costs would directly impact the interests of the consumers IREC represents.

7. IREC has unique expertise in interconnection procedures, which is informed by its nationwide engagement on the issue. Over the past five years, IREC has worked in nearly 40 states to implement successful regulatory policies and programs that have greatly reduced barriers for interconnection of distributed energy resources, most recently in Illinois, Ohio, North Carolina, South Carolina, Massachusetts, California, Iowa, Minnesota, Maryland, Nevada, New York and Hawaii. As explained above, here in South Carolina, IREC was an active participant in developing the State's current interconnection procedures and is thus especially familiar with these procedures and what they were designed to do. Further, IREC has participated in the formation of cluster and group study processes in California, Massachusetts, and at FERC, and thus can offer particular insights and expertise relevant to Duke's request here. IREC is also interested in supporting a fair and efficient interconnection process in South Carolina that effectively implements the state's renewable energy policy, Act 236. IREC will leverage this knowledge of South Carolina's policies in particular, and state and federal policies in general, to provide useful, nationally based insight into resolution of this matter.

8. Without intervention in this proceeding, there is no way for IREC to adequately protect its substantial interest in fair practices that ensure the safe and efficient integration and adoption of renewable energy for the benefit of South Carolina ratepayers that could be impacted if Duke's request for waiver is granted. IREC further has an interest in ensuring the adopted interconnection procedures—which it devoted substantial resources

to develop and see approved by the Commission when it intervened in the previous docket concerning the procedures—are not unnecessarily waived.

9. IREC's Petition to Intervene is timely.

10. Granting IREC's Petition to Intervene would be in the public interest and consistent with the Commission's policies encouraging maximum public participation in the issues before it. IREC's intervention will help ensure that a full and complete record addressing its views is developed.

11. The Commission granted IREC's petition to intervene in the previous docket concerning South Carolina's interconnection procedures.⁵ The Commission should likewise permit IREC to intervene here, where the same concerns are at issue.

12. IREC is represented by counsel in this proceeding and service should be directed to the following addresses:

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⁵ Pub. Serv. Comm. of S.C., Dkt. 2015-362-E, Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard, Directive Order No. 2015-832 (Dec. 2, 2015).

CONCLUSION

WHEREFORE, IREC prays for the following relief:

1. That this Petition to Intervene be accepted and that IREC be made a party of record; and
2. That IREC be allowed to participate fully in this proceeding and take such positions as it deems advisable.

DATED: August 17, 2018

TERRENI LAW FIRM, L.L.C.

By:




CHARLES L.A. TERRENI

DATED: August 17, 2018

SHUTE, MIHALY & WEINBERGER LLP

By:



LAURA D. BEATON
*Application for Pro Hac Vice
has been submitted*

Attorneys for INTERSTATE RENEWABLE
ENERGY COUNCIL, INC.

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2018-202-E

In Re:)
)
) **CERTIFICATE OF SERVICE**
Petition of Duke Energy Carolinas, LLC)
and Duke Energy Progress, LLC for)
Approval of CPRE Queue Number)
Proposal, Limited Waiver of Generator)
Interconnection Procedures, and Request)
for Expedited Review)

The undersigned, Amy Zehring, does hereby certify that the following persons have been served with one copy PETITION TO INTERVENE in the above captioned proceeding by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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Executed in San Francisco, CA on August 17, 2018



Amy Zehring

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